

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA,

3:12-cv-02265-SI

Plaintiff,

v.

[PROPOSED] ORDER

CITY OF PORTLAND,

Defendant.

Robert Taylor, City Attorney; Heidi Brown, Chief Deputy City Attorney; Sarah Ames and Lisa Rogers, Deputy City Attorneys, OFFICE OF THE CITY ATTORNEY, 1221 SW Fourth Avenue, Room 430, Portland, OR 97204. Of Attorneys for Defendant.

William M. Narus, United States Attorney, UNITED STATES ATTORNEY'S OFFICE, DISTRICT OF OREGON, 1000 SW Third Avenue, Suite 600, Portland, OR 97204; Harmeet K. Dhillon, Assistant Attorney General; R. Jonas Geissler, Deputy Assistant Attorney General; Andrew Darlington, Acting Chief; Laura L. Cowall, Deputy Chief; Jared D. Hager, Jeffrey Murray and Catherine Yoon, Trial Attorneys, Special Litigation Section; Civil Rights Division, UNITED STATES DEPARTMENT OF JUSTICE, 950 Pennsylvania Avenue, NW, Washington, D.C. 20530. Of Attorneys for Plaintiff.

Anil S. Karia, PUBLIC SAFETY LABOR GROUP, P.O. Box 12070, Portland, OR 97212. Of Attorneys for Intervenor-Defendant Portland Police Association.

J. Ashlee Albies, ALBIES, STARK & GUERRIERO, 1500 SW First Ave., Suite 1000, Portland, OR 97201; Rian Peck, VISIBLE LAW LLC, 333 SW Taylor Street, Suite 300, Portland, OR 97204. Of Attorneys for Enhanced *Amicus Curiae* Albina Ministerial Alliance Coalition for Justice and Police Reform.

Juan Chavez, Project Director and Attorney, OREGON JUSTICE RESOURCE CENTER, P.O. Box 5248, Portland, OR 97204. Of Attorneys for *Amicus Curiae* Mental Health Alliance.

Michael H. Simon, District Judge.

On July 24th, 2025, Plaintiff United States of America (United States) and Defendant City

of Portland (City) filed a Joint Stipulated Motion (Motion) to enter a further amended Settlement Agreement (Agreement) that was previously entered as an Order of this Court, effective January 2, 2025 (ECF 486). The first further amendment conforms Paragraph 212 to the City of Portland's new form of government under its City Charter. The second clarifies the Parties' intent about the impact of a section's termination in drafting Paragraph 251: Terminated sections of the Agreement will no longer inform outcome assessments, as those terminated sections are no longer part of the Settlement Agreement or subject to monitoring by the Independent Court-Appointed Monitor. The third amendment clarifies the Parties' determination of discrete subsections subject to self-monitoring following the Monitor's first report, better reflecting their intent in drafting.

The parties solicited input on the first two amendments from Intervenor Portland Police Association, Enhanced *Amicus Curiae* Albina Ministerial Alliance Coalition for Justice and Police Reform, and *Amicus Curiae* Mental Health Alliance, prior to submitting the Motion. For the reasons stated by the Court, the parties, and other interested persons, both in writing and orally during the hearing held on July 29, 2025, the Court GRANTS the Joint Motion to Amend the Amended Settlement Agreement (ECF 499).

The Court ORDERS that the Amended Settlement Agreement, Exhibit 1 hereto, shall be and is entered as an Order of the Court, superseding the versions of the Agreement previously entered in this matter.

IT IS SO ORDERED.

DATED this ____ day of _____, 2025.

Michael H. Simon
United States District Judge